

JONATHAN D. DAVIS, P.C.
ATTORNEYS AT LAW
10 ROCKEFELLER PLAZA
SUITE 1015
NEW YORK, NEW YORK 10020

TEL: (212) 687-5464
FAX: (212) 697-2521
WWW.JDDAVISPC.COM

November 22, 2021

VIA ECF

The Honorable Lewis J. Liman
United States District Judge
United States District Court
500 Pearl Street, Room 701
New York, New York 10007

Re: Combs v. GBG Sean John LLC (No. 21-cv-00996 (LJL))

Dear Judge Liman:

We are counsel to Plaintiff Sean Combs (“Combs”) in the above-referenced action against Defendants GBG Sean John LLC (“GBGSJ”), GBG USA Inc. (“GBG USA,” together with GBGSJ, “GBG”), Missguided Limited, and Missguided USA (Finance) Inc. (collectively, “Missguided”).

On September 21, 2021, Combs and GBG (collectively, the “Parties”) jointly requested a stay of this entire action given GBG USA’s bankruptcy filing and the potential sale of the GBGSJ business through the bankruptcy process, under the confidential procedures governing any such sale. The Parties requested the stay to protect and preserve their rights while exploring a potential resolution of their dispute and fostering judicial economy.

The Court granted the Parties’ requested stay and ordered the Parties to “jointly write to the Court to provide a status of *In re GBG USA Inc.*, Case No. 21-11369 (MEW) (Bankr. S.D.N.Y. July 29, 2021), including whether additional time is needed to conclude the bankruptcy process as it impacts proceedings in this action” (Dkt. No. 50) thirty days prior to expiration of the stay.

The Parties therefore jointly submit this letter, in accordance with your Honor’s 90-Day Stay Order, to inform the Court that the potential sale of GBG USA’s assets through the bankruptcy proceeding has been diligently negotiated (and continues to be), but has not yet concluded, despite the Parties’ good-faith efforts to bring that process to an end.

The Parties have conferred with their respective counsel and representatives and agree that at least another thirty (30) days will be needed after expiration of the current stay to conclude the anticipated bankruptcy sale that pertains to this action. The Parties respectfully submit that

The Honorable Lewis J. Liman
November 22, 2021
Page 2

extending the current stay, which is set to expire on December 22, 2021, to January 21, 2022, will contribute to the just, speedy, and efficient determination of the action. If the Court is in agreement with the Parties' proposal to extend the stay, then the Parties will submit a proposed order for the Court's consideration.

The Parties thank the Court for its consideration of this letter.

Respectfully submitted,

/s/ Jonathan D. Davis

Jonathan D. Davis

cc: Rose Cordero Prey, Esq.
Sabina A. Vayner, Esq. (VIA ECF)

Approved.

SO ORDERED.



LEWIS J. LIMAN
United States District Judge

Date: November 23, 2021
New York, NY